

December 15, 2021

Kathleen M. McKenna Member of the Firm d +1.212.969.3130 f 212.969.2900 kmckenna@proskauer.com www.proskauer.com

VIA ECF

The Honorable Mary Kay Vyskocil **United States District Court** Southern District of New York 500 Pearl Street, Room 2230 New York, New York 10007

Re: Willie Dennis v. K&L Gates LLP, et al., No. 1:20-cv-09393-MKV

Dear Judge Vyskocil:

We represent Defendants in the above-referenced matter and submit this joint status report, on behalf of all parties, pursuant to the Court's March 24, 2021 Order (Dkt. No. 35).

The arbitration proceeding initiated by Mr. Dennis under the auspices of the American Arbitration Association ("AAA") remains pending. Recently, criminal charges against Mr. Dennis were unsealed in a matter captioned *United States v. Dennis*, 20 Cr. 623 (LGS) (S.D.N.Y.). Because the allegations in the criminal proceedings overlap with the facts and issues in the arbitration, on December 13, 2021, Mr. Dennis requested a stay of the AAA arbitral proceeding pending a resolution of the criminal charges brought against him. Defendants have consented to Mr. Dennis's request.

Respectfully submitted,

/s/ Kathleen M. McKenna

cc: Willie Dennis, Esq. (by ECF) Neil P. Kelly, Esq., Assistant Federal Defender; criminal counsel to Mr. Dennis (via email)